

(4373)

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

TO: RUTH K. HOWELL

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, as such time and place as you may appoint, to call before you and examine KAY OWEN GANEY

a witness in behalf of Complainant in a cause pending in our  
Circuit Court in Baldwin County, of said State, wherein KAY OWEN GANEY

and HOWARD GANEY, Complainant

Respondent

on oath, to be by you administered, upon her  
to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 13 day of Nov.

, 1959  
Alice J. Duck  
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No.

THE STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

KAY OWEN GANEY

Complainant

VS.

HOWARD GANEY

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

FILED

NOV 13 1959

ALICE J. DUCK, RECLERK

KAY OWEN GANEY

Complainant

VS

HOWARD GANEY

Respondent

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

IN EQUITY

NUMBER: ~~3647~~ 4373

Comes now your Complainant, Kay Owen Ganey and shows unto your Honor as follows:

I

That she is over the age of 21 years and is a bona fide resident of Bay Minette, Baldwin County, Alabama and that Howard Ganey, Respondent, is over the age of twenty-one years and is a resident of Bay Minette, Baldwin County, Alabama.

II

That on October 31, 1954 Complainant and Respondent went through a marriage ceremony before a Justice of the Peace in Pascagoula, Mississippi and that they lived together as husband and wife from that date until August 20, 1958. That at the time of the said marriage Respondent represented to Complainant that he had been married and divorced some time prior to October 31, 1954 and that Complainant believed that Respondent was free to marry.

III

That subsequent to the said marriage to-wit: August 20, 1958 Complainant discovered that on October 31, 1954 Respondent was still married and that he was not divorced from his former wife and that as a consequence he was not free to marry; that she left the bed and board of Respondent and has not lived with him since that time.

Now therefore, Complainant prays that Respondent, Howard Ganey be made party Respondent to this complaint, that he be required to answer, plead or demur to same within the time required by law and the practice of this Court and that, upon a final hearing of this cause Your Honor will make and enter a decree declaring the bonds of matrimony supposed to exist between Complainant and Respondent null, void and to no effect, and Complainant prays for such other further and different relief to which she may be in good conscience and equity entitled.

Kay Owen Ganey  
W. L. Hays  
Solicitor for Complainant

KAY OWEN GANEY

Complainant

VS

HOWARD GANEY

Respondent

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

IN EQUITY

NUMBER: \_\_\_\_\_

ANNULMENT

**FILED**

SEP 3 1958

ALICE J. DUCK, Register

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,  
Baldwin County.



Circuit Court, Baldwin County

No. \_\_\_\_\_

\_\_\_\_\_ TERM, 19\_\_

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Comanded to Summon Howard Ganey

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in  
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against \_\_\_\_\_

Howard Ganey \_\_\_\_\_, Defendant

by Kay Owen Ganey \_\_\_\_\_

\_\_\_\_\_, Plaintiff

Witness my hand this 3rd day of Sept. 19\_\_58

Lucie J. Newk \_\_\_\_\_, Clerk

No. 43-72 Page \_\_\_\_\_

The State of Alabama  
Baldwin County

CIRCUIT COURT

KAY OWEN GANEY

Plaintiffs

vs.

HOWARD GANEY

Defendants

Summons and Complaint

Filed 9-3- 19 58

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

9/4 1958

\_\_\_\_\_, Sheriff

I have executed this summons

this 9-4 1958

by leaving a copy with

Howard Ganey

Taylor Wilkins Sheriff

W. A. Tolbert Deputy Sheriff

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